

2000-01-01

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U. S. DEPARTMENT OF AGRICULTURE
BUREAU OF PLANT INDUSTRY
WASHINGTON, D. C.

NO. S1-4:07CR00231 JCH (DDN)

Defendants.

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dants Erik G.

2. It was further part of the drug-trafficking conspiracy that defendants Erik G. Garcia and Marco A. Garcia utilizing various addresses, either directly or utilizing co-conspirators and other individuals shipped significant quantities of marijuana from Arizona to locations within the Eastern District of Missouri and elsewhere.

3. It was further part of the drug-trafficking conspiracy that the marijuana would be shipped to Zelman Sanders, III, Michael Mabry and Perry L. Sheard utilizing various delivery sites.

4. It was further part of the drug-trafficking conspiracy that Zelman Sanders, III, Michael Mabry and Perry L. Sheard redistributed the marijuana to individuals within the Eastern District of Missouri.

5. It was further part of the drug-trafficking conspiracy that money, in the form of United States Postal money orders and other types of money orders, were mailed back to defendants Erik G. Garcia and Marco A. Garcia and co-conspirators in Arizona for the purchase/payment of marijuana.

6. It was further part of the drug-trafficking conspiracy that money, in the form of cash deposits into various Arizona bank accounts, were made in the Eastern District of Missouri by Zelman Sanders, III, and co-conspirators either directly or by utilizing other individuals for the purchase/payment of marijuana.

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1); and

The quantity of the controlled substance involved in the offense was in excess of 100 kilograms of marijuana, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(B)(vii).

COUNT TWO

The Grand Jury further charges that:

A. In or about August 2004, and continuing thereafter to the date of the indictment, with the exact dates unknown to this Grand Jury, in the Eastern District of Missouri and elsewhere,

**ERIK G. GARCIA and
MARCO A. GARCIA,**

the defendants herein, did knowingly and willfully conspire, combine, confederate and agree with Zelman Sanders, III and other persons known and unknown to this Grand Jury, to commit an offense against the United States, to wit: (a) to knowingly and willfully conduct financial transactions affecting interstate commerce, to wit: transactions in the Eastern District of Missouri involving the purchase of United States Postal Money Orders and other money orders and their subsequent negotiation in Arizona; and that these transactions involved the proceeds of some form of an unlawful activity, to wit: conspiracy to distribute and possess with intent to distribute marijuana; (b) with the intent to promote the carrying on of the above referenced specified unlawful activity; and (c) that while conducting and attempting to conduct such financial transactions the defendants knew that the money involved in the financial transactions represented the proceeds of some unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

B. MANNER AND MEANS OF THE CONSPIRACY

The defendants Erik G. Garcia and Marco A. Garcia and co-conspirators including Zelman Sanders, III, accomplished and attempted to accomplish the object of this money laundering conspiracy in the following manner and through the following means:

1. It was part of said money laundering conspiracy that Zelman Sanders, III, conspiring with defendants Erik G. Garcia and Marco A. Garcia utilized money derived from drug trafficking activity and purchased United States Postal Money Orders and other money orders in the St. Louis, Missouri, metropolitan area and elsewhere.

2. It was part of said money laundering conspiracy that the postal money orders and other types of money orders would be mailed and/or shipped to defendant Erik G. Garcia and others in Arizona for the purchase/payment of marijuana.

3. It was part of said money laundering conspiracy that defendants Erik G. Garcia, Marco A. Garcia, co-conspirators and others would submit the money orders directly to merchants in exchange for other assets, deposit the money orders into bank accounts or cash or direct others to cash the United States Postal Money Orders in Arizona.

4. It was part of said money laundering conspiracy that defendant Zelman Sanders, III, would make cash deposits and/or direct others to make cash deposits from the Eastern District of Missouri into various Arizona bank accounts belonging to co-conspirators and others.

5. The United States Postal Money Orders purchased and/or negotiated by the defendants include but are not limited to the following:

<u>Date</u>	<u>Event</u>	<u>Item No.</u>	<u>Issue Zip</u>	<u>Addressee / Payee:</u>	<u>Sender / Payor:</u>	<u>Amount</u>
01/10/05	MO Purchase	0670550800	63017	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00
01/10/05	MO Purchase	0670550801	63017	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00
01/10/05	MO Purchase	0670550802	63017	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00
01/10/05	MO Purchase	0707504104	62201	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00
01/10/05	MO Purchase	0707504105	62201	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00
01/10/05	MO Purchase	0707504106	62201	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00
01/10/05	MO Purchase	0707504107	62201	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00

<u>Date</u>	<u>Event</u>	<u>Item No.</u>	<u>Issue Zip</u>	<u>Addressee / Payee:</u>	<u>Sender / Pavor:</u>	<u>Amount</u>
01/10/05	MO Purchase	0707504108	62201	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00
01/10/05	MO Purchase	0707504109	62201	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00
01/10/05	MO Purchase	0708339719	63017	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00
01/10/05	MO Purchase	0708339720	63017	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00
01/10/05	MO Purchase	0708339721	63017	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00
01/10/05	MO Purchase	0708339722	63017	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00
01/10/05	MO Purchase	0708339723	63017	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00
01/10/05	MO Purchase	0708339724	63017	(Seized By USPIS)	(Seized By USPIS)	\$1,000.00
01/10/05 Total						\$15,000.00
01/20/05	MO Purchase	0707572089	62203	Sam Levitz Furniture Co.	Antonio Ceja, 1305 N Grand, Nogales, AZ 85621	\$1,000.00
01/20/05	MO Purchase	0707572090	62203	Imagine Realty	Monica Chavez 5077 E. Butterwood Tucson, AZ 85706	\$1,000.00
01/20/05	MO Purchase	0707572091	62203	Sears (036360617299-9)	Ken or Barb Dean 301 W. Black Rd. Huachuca City, AZ 85616	\$800.00
01/20/05 Total						\$2,800.00
01/21/05	MO Purchase	0669626652	62204	Sam Levitz Furniture Co.	Antonio Ceja 1305 N Grand Nogales, AZ 85621	\$1,000.00
01/21/05	MO Purchase	0669626653	62204	Kondwani Johnson 7360 E Fayette Tucson, AZ 85730	Charmella Floy 4504 W 27th, Apt 10 Pine Bluff, AR 71603	\$750.00
01/21/05	MO Purchase	0707505962	62201	Jesses Pro Tire & Wheel	Felix I	\$1,000.00
01/21/05	MO Purchase	0707505963	62201	Jesses Pro Tire & Wheel	Felix I	\$1,000.00
01/21/05	MO Purchase	0707505964	62201	Clementina Rivera	Clementina Rivera	\$800.00
01/21/05	MO Purchase	0707572174	62203	Ship-n-Mail Express 2114 W. Grant Road Tucson, AZ 85745		\$1,000.00
01/21/05	MO Purchase	0707572175	62203	Sam Levitz Furniture Co.	Antonio Ceja 1305 N Grand Nogales, AZ 85621	\$1,000.00
01/21/05	MO Purchase	0707572176	62203	Clementina Rivera	Clementina Rivera	\$800.00
01/21/05	MO Purchase	0708339550	63017	Monica Chavez 1111 E. Limberlost #33 Tucson, AZ 85719	Ernesto Chavez 331 W. Grant #1 Phoenix, AZ 85003	\$1,000.00

<u>Date</u>	<u>Event</u>	<u>Item No.</u>	<u>Issue Zip</u>	<u>Addressee / Payee:</u>	<u>Sender / Pavor:</u>	<u>Amount</u>
01/21/05	MO Purchase	0708339551	63017	A-L Financial 3151 E. Broadway Tucson, AZ 85711	Arnulfo Garcia 1111 E. Limberlost #33 Tucson, AZ 85719	\$1,000.00
01/21/05	MO Purchase	0708339552	63017	Arnulfo V. Garcia 1111 E. Limberlost Tucson, AZ 85719	Rogelio Armento 6410 N. Galaxy Tucson, AZ 85749	\$1,000.00
01/21/05	MO Purchase	0708339553	63017	Lorencia Alvarez 123 W Delano Tucson, AZ 85705	Erik Garcia	\$1,000.00
01/21/05	MO Purchase	0708339554	63017	Marco Garcia 1111 E. Limberlost #33 Tucson, AZ 85719	Arnulfo Garcia 1111 E. Limberlost #33 Tucson, AZ 85719	\$1,000.00
01/21/05	MO Purchase	0708339555	63017	Monica Chavez 1111 E. Limberlost #33 Tucson, AZ 85719	Ernesto Chavez 331 W. Grant #1 Phoenix, AZ 85003	\$1,000.00
01/21/05 Total						\$13,350.00
01/31/05	MO Purchase	0670162301	62208	Arlette Garcia 168 W. Finedale Tucson, AZ 85706	Jose Carrasco	\$1,000.00
01/31/05	MO Purchase	0670162302	62208	Ship-n-Mail Express 2114 W. Grant Road Tucson, AZ 85745	Natures Gems	\$1,000.00
01/31/05	MO Purchase	0670162303	62208	Arnulfo V. Garcia 1111 E. Limberlost Tucson, AZ 85719	Jorge Ramos	\$800.00
01/31/05	MO Purchase	0707354659	62223	Arlette Garcia 168 W. Finedale Tucson, AZ 85706	Jose Carrasco	\$1,000.00
01/31/05	MO Purchase	0707354660	62223	Arlette Garcia 168 W. Finedale Tucson, AZ 85706	Jose Carrasco	\$1,000.00
01/31/05	MO Purchase	0707354661	62223	Support Payment Clearing House PO Box 52107 Phoenix, AZ 85072	Gabriel Garcia 1111 E. Limberlost #33 Tucson, AZ 85719	\$800.00
01/31/05	MO Purchase	0708339829	63017	Arnulfo V. Garcia 1111 E. Limberlost Tucson, AZ 85719	Jorge Ramos	\$1,000.00
01/31/05	MO Purchase	0708339830	63017	Marco Garcia 1111 E. Limberlost #33 Tucson, AZ 85719	Carlos Soto	\$1,000.00
01/31/05	MO Purchase	0708339831	63017	Arnulfo V. Garcia 1111 E. Limberlost Tucson, AZ 85719	Jorge Ramos	\$1,000.00
01/31/05	MO Purchase	0708339832	63017	Arnulfo V. Garcia 1111 E. Limberlost Tucson, AZ 85719	Jorge Ramos	\$1,000.00
01/31/05	MO Purchase	0708339833	63017	Marco Garcia 1111 E. Limberlost #33 Tucson, AZ 85719	Carlos Soto	\$1,000.00

<u>Date</u>	<u>Event</u>	<u>Item No.</u>	<u>Issue Zip</u>	<u>Addressee / Payee:</u>	<u>Sender / Pavor:</u>	<u>Amount</u>
01/31/05	MO Purchase	0708339834	63017	Lorencia Alvarez 123 W Delano Tucson, AZ 85705	Erik Garcia	\$1,000.00
01/31/05	MO Purchase	0743754726	63011	Arnulfo V. Garcia 1111 E. Limberlost Tucson, AZ 85719	Jorge Ramos	\$1,000.00
01/31/05	MO Purchase	0743754727	63011	Marco Garcia 1111 E. Limberlost #33 Tucson, AZ 85719	Carlos Soto	\$1,000.00
01/31/05	MO Purchase	0743754728	63011	Lorencia Alvarez 123 W Delano Tucson, AZ 85705	Erik Garcia	\$1,000.00
01/31/05	MO Purchase	0743754729	63011	Arlette Garcia 168 W. Finedale Tucson, AZ 85706	Jose Carrasco	\$1,000.00
01/31/05	MO Purchase	0743754730	63011	Arlette Garcia 168 W. Finedale Tucson, AZ 85706	Jose Carrasco	\$1,000.00
01/31/05 Total						\$16,600.00
02/01/05	MO Purchase	0640710510	62201	Stewart Title 5650 S. 12th Ave. Tucson, AZ 85706	Maria G	\$400.00
02/01/05	MO Purchase	0640710511	62201	Marco Garcia 1111 E. Limberlost #33 Tucson, AZ 85719	Carlos Rojas	\$400.00
02/01/05	MO Purchase	0640710512	62201	Monica Chavez 1111 E. Limberlost #33 Tucson, AZ 85719	Armando Nunez 6816 W. Sire Libre Glendale, AZ 85306	\$1,000.00
02/01/05	MO Purchase	0640710513	62201	Bernadette Contreas 2101 S. Cottonwood Lane Tucson, AZ 85713	Cipriano 5290 S Rock #1105 Tucson, AZ	\$1,000.00
02/01/05	MO Purchase	0640870024	63011	Marco Garcia 1111 E. Limberlost #33 Tucson, AZ 85719	Carlos Rojas	\$700.00
02/01/05	MO Purchase	0640870025	63011	Ship-n-Mail Express 2114 W. Grant Road Tucson, AZ 85745		\$700.00
02/01/05	MO Purchase	0669626769	62204	Marco Garcia 1111 E. Limberlost #33 Tucson, AZ 85719	Art Garcia	\$1,000.00
02/01/05	MO Purchase	0669626770	62204	Bernadette Contreas 2101 S. Cottonwood Lane Tucson, AZ 85713	Cipriano 5290 S Rock #1105 Tucson, AZ	\$1,000.00
02/01/05	MO Purchase	0669626771	62204	Monica Chavez 1111 E. Limberlost #33 Tucson, AZ 85719	Ernesto Chavez 331 W. Grant #1 Phoenix, AZ 85003	\$800.00
02/01/05	MO Purchase	0669626788	62204	Janel Laguna 4120 S. Queen Palm Tucson, AZ 85730	Terry Gomez	\$1,000.00
02/01/05	MO Purchase	0669626789	62204	Monica Chavez 1111 E. Limberlost #33 Tucson, AZ 85719	Armando Nunez 6816 W Sire Libre Glendale, AZ 85306	\$1,000.00

<u>Date</u>	<u>Event</u>	<u>Item No.</u>	<u>Issue Zip</u>	<u>Addressee / Payee:</u>	<u>Sender / Payer:</u>	<u>Amount</u>
02/01/05	MO Purchase	0669626795	62204	Mary Suttle 1704 N. 45 th E. St. Louis, Illinois 62204	Zelman Sanders 1769 N. 38 th E. St. Louis, Illinois 62204	\$800.00
02/01/05	MO Purchase	0669626796	62204	Zelman Sanders 1704 N. 45 th E. St. Louis, Illinois	Mary Suttle 1704 N. 45 th E. St. Louis, Illinois	\$1,000.00
02/01/05	MO Purchase	0669626797	62204	Zelman Sanders 1704 N. 45 th E. St. Louis, Illinois	Mary Suttle 1704 N. 45 th E. St. Louis, Illinois	\$1,000.00
02/01/05	MO Purchase	0670161066	62208	Arnulfo V. Garcia 1111 E. Limberlost Tucson, AZ 85719	Jorge Ramos	\$1,000.00
02/01/05	MO Purchase	0670161067	62208	Arnulfo V. Garcia 1111 E. Limberlost Tucson, AZ 85719	Jorge Ramos	\$1,000.00
02/01/05	MO Purchase	0670161068	62208	Lorencia Alvarez 123 W Delano Tucson, AZ 85705	Erik Garcia	\$800.00
02/01/05	MO Purchase	0670162311	62208	Desert Springs 3727 E 24th Street Tucson, AZ 85708	Marco A. Gargia 5484 N. 43rd, #43 Glendale, AZ 85301	\$850.00
02/01/05	MO Purchase	0670162312	62208	Janel Laguna 4120 S. Queen Palm Tucson, AZ 85730	Terry Gomez	\$1,000.00
02/01/05	MO Purchase	0670272510	62201	Lolamai Mobile Park 5484 N 43rd Ave. Glendale, AZ 85301	Marco A. Garcia 5484 N. 43rd, #43 Glendale, AZ 85301	\$600.00
02/01/05	MO Purchase	0670272511	62201	Lorencia Alvarez 123 W Delano Tucson, AZ 85705	Gloria Torres	\$600.00
02/01/05	MO Purchase	0670272512	62201	Marco Garcia 1111 E. Limberlost #33 Tucson, AZ 85719	Carlos Rojas	\$800.00
02/01/05	MO Purchase	0670272513	62201	Ship-n-Mail Express 2114 W. Grant Road Tucson, AZ 85745	Natures Gems	\$800.00
02/01/05	MO Purchase	0670272531	62201	Meloza Moreno 4444 E. Benson Hwy. #161 Tucson, AZ		\$1,000.00
02/01/05	MO Purchase	0670272532	62201	Bernadette Contreas 2101 S. Cottonwood Lane Tucson, AZ 85713	Cipriano 5290 S Rock #1105 Tucson, AZ	\$1,000.00
02/01/05	MO Purchase	0670272533	62201	Evangelina Meza 3309 S. Napa Vista Tucson, AZ 85713	David Terrazas 2850 E. Kaibab Vista Tucson, AZ 85713	\$1,000.00
02/01/05	MO Purchase	0707354667	62223	Arnulfo V. Garcia 1111 E. Limberlost Tucson, AZ 85719	Jorge Ramos	\$1,000.00
02/01/05	MO Purchase	0707354668	62223	Marco Garcia 1111 E. Limberlost #33 Tucson, AZ 85719	Carlos Soto	\$1,000.00

<u>Date</u>	<u>Event</u>	<u>Item No.</u>	<u>Issue Zip</u>	<u>Addressee / Payee:</u>	<u>Sender / Payor:</u>	<u>Amount</u>
02/01/05	MO Purchase	0707354669	62223	Lorencia Alvarez 123 W Delano Tucson, AZ 85705	Erik Garcia	\$800.00
02/01/05	MO Purchase	0707354845	62223	Bernadette Contreas 2101 S. Cottonwood Lane Tucson, AZ 85713	Cipriano 5290 S Rock #1105 Tucson, AZ	\$1,000.00
02/01/05	MO Purchase	0707354846	62223	Meloza Moreno 4444 E. Benson Hwy #161 Tucson, AZ		\$1,000.00
02/01/05	MO Purchase	0707354847	62223	Miguel Hong 5603 E. 28th Street Tucson, AZ 85711	Amelia Chivas 4723 S. Camino De La Plaza Tucson, AZ 85714	\$800.00
02/01/05	MO Purchase	0707355098	62223	Meloza Moreno 4444 E. Benson Hwy #161 Tucson, AZ		\$1,000.00
02/01/05	MO Purchase	0707355099	62223	Meloza Moreno 4444 E. Benson Hwy #161 Tucson, AZ		\$1,000.00
02/01/05	MO Purchase	0707355100	62223	Ship-n-Mail Express 2114 W. Grant Road Tucson, AZ 85745		\$800.00
02/01/05	MO Purchase	0707355223	62223	Janel Laguna 4120 S. Queen Palm Tucson, AZ 85730	Terry Gomez	\$1,000.00
02/01/05	MO Purchase	0707467424	62203	Lorencia Alvarez 123 W Delano Tucson, AZ 85705	Erik Garcia	\$800.00
02/01/05	MO Purchase	0707467425	62203	Arnulfo V. Garcia 1111 E. Limberlost Tucson, AZ 85719	Jorge Ramos	\$1,000.00
02/01/05	MO Purchase	0707467426	62203	Lorencia Alvarez 123 W Delano Tucson, AZ 85705	Erik Garcia	\$1,000.00
02/01/05	MO Purchase	0707467427	62203	Janel Laguna 4120 S. Queen Palm Tucson, AZ 85730	Terry Gomez	\$1,000.00
02/01/05	MO Purchase	0707467428	62203	Janel Laguna 4120 S. Queen Palm Tucson, AZ 85730	Terry Gomez	\$1,000.00
02/01/05	MO Purchase	0707467429	62203	Miguel Hong 5603 E. 28th Street Tucson, AZ 85711	Amelia Chivas 4723 S. Camino De La Plaza Tucson, AZ 85714	\$800.00
02/01/05	MO Purchase	0707467435	62203	Marco Garcia 1111 E. Limberlost #33 Tucson, AZ 85719	Art Garcia	\$1,000.00
02/01/05	MO Purchase	0707467436	62203	Marco Garcia 1111 E. Limberlost #33 Tucson, AZ 85719	Art Garcia	\$1,000.00
02/01/05	MO Purchase	0707467437	62203	Evangelina Meza 3309 S. Napa Vista Tucson, AZ 85713	David Terrazas 2850 E. Kaibab Vista Tucson, AZ 85713	\$800.00

<u>Date</u>	<u>Event</u>	<u>Item No.</u>	<u>Issue Zip</u>	<u>Addressee / Payee:</u>	<u>Sender / Pavor:</u>	<u>Amount</u>
02/01/05	MO Purchase	0707467442	62203	Meloza Moreno 4444 E. Benson Hwy #161 Tucson, AZ		\$1,000.00
02/01/05	MO Purchase	0707467443	62203	Monica Chavez 1111 E. Limberlost #33 Tucson, AZ 85719	Armando Nunez 6816 W Sire Libre Glendale, AZ 85306	\$1,000.00
02/01/05	MO Purchase	0707672540	63117	Evangelina Meza 3309 S. Napa Vista Tucson, AZ 85713	David Terrazas 2850 E. Kaibab Vista Tucson, AZ 85713	\$1,000.00
02/01/05	MO Purchase	0707672541	63117	Evangelina Meza 3309 S. Napa Vista Tucson, AZ 85713	David Terrazas 2850 E. Kaibab Vista Tucson, AZ 85713	\$1,000.00
02/01/05	MO Purchase	0707672542	63117	Miguel Hong 5603 E. 28th Street Tucson, AZ 85711	Amelia Chivas 4723 S. Camino De La Plaza Tucson, AZ 85714	\$800.00
02/01/05	MO Purchase	0708339952	63017	A-L Financial 3151 E. Broadway Tucson, AZ 85711	Arnulfo Garcia 1111 E. Limberlost #33 Tucson, AZ 85719	\$1,000.00
02/01/05	MO Purchase	0708339953	63017	A-L Financial 3151 E. Broadway Tucson, AZ 85711	Arnulfo Garcia 1111 E. Limberlost #33 Tucson, AZ 85719	\$1,000.00
02/01/05	MO Purchase	0708339954	63017	Marco Garcia 1111 E. Limberlost #33 Tucson, AZ 85719	Carlos Soto	\$800.00
02/01/05	MO Purchase	0743780130	63117	Ship-n-Mail Express 2114 W. Grant Road Tucson, AZ 85745	Natures Gems	\$1,000.00
02/01/05	MO Purchase	0743780131	63117	Evangelina Meza 3309 S. Napa Vista Tucson, AZ 85713	David Terrazas 2850 E. Kaibab Vista Tucson, AZ 85713	\$1,000.00
02/01/05	MO Purchase	0743780132	63117	Miguel Hong 5603 E. 28th Street Tucson, AZ 85711	Amelia Chivas 4723 S. Camino De La Plaza Tucson, AZ 85714	\$800.00
02/01/05 Total						\$50,450.00
Grand Total						\$98,200.00

6. Zelman Sanders, III, made cash deposits in the Eastern District of Missouri and elsewhere into various Arizona bank accounts held in the names of co-conspirators and others where the money was utilized. The cash deposits made and utilized by the defendants include but are not limited to the following:

<i>Date of Dep</i>	<i>City, State of First Dep</i>	<i>Bank of America Branch</i>	<i>Account No.</i>	<i>Amount</i>
9/3/04	Little Rock, Arkansas	Little Rock Main	XXXXXXXXX1221	\$4,000.00
9/3/04	Saint Louis, Missouri	East Roosevelt	XXXXXXXXX1221	\$3,000.00
9/18/04	Chesterfield, Missouri	Baxter Road	XXXXXXXXX1221	\$2,500.00
9/20/04	Swansea, Illinois	Swansea	XXXXXXXXX1221	\$4,500.00
11/20/04	Ballwin, Missouri	Ballwin	XXXXXXXXX1221	\$7,830.00
11/30/04	Chesterfield, Missouri	Baxter Road	XXXXXXXXX1221	\$4,000.00
12/16/04	Chesterfield, Missouri	Baxter Road	XXXXXXXXX1221	\$4,150.00
12/21/04	Saint Louis, Missouri	Plaza	XXXXXXXXX1221	\$5,000.00
1/4/05	Saint Louis, Missouri	Lindell	XXXXXXXXX1221	\$5,000.00
1/19/05	Saint Louis, Missouri	Plaza	XXXXXXXXX1221	\$5,000.00
1/26/05	Saint Louis, Missouri	Plaza	XXXXXXXXX1221	\$2,050.00
2/9/05	O'Fallon, Illinois	O'Fallon	XXXXXXXXX1221	\$5,000.00
2/14/05	Chesterfield, Missouri	Baxter Road	XXXXXXXXX1221	\$3,000.00
3/10/05	Chesterfield, Missouri	Baxter Road	XXXXXXXXX1221	\$1,500.00
			XXXXXXXXX1221	
			Total	\$56,530.00
3/20/06	Saint Louis, Missouri	Manchester	XXXXXXXXX1327	\$7,800.00
3/27/06	Saint Louis, Missouri	Manchester	XXXXXXXXX1327	\$8,000.00
4/3/06	Swansea, Illinois	Swansea	XXXXXXXXX1327	\$7,000.00
4/18/06	O'Fallon, Illinois	O'Fallon	XXXXXXXXX1327	\$8,000.00
4/27/06	Swansea, Illinois	Swansea	XXXXXXXXX1327	\$8,000.00
5/3/06	O'Fallon, Illinois	O'Fallon	XXXXXXXXX1327	\$8,000.00
5/25/06	Chesterfield, Missouri	Baxter Road	XXXXXXXXX1327	\$7,000.00
7/19/06	Norman, Oklahoma	Norman Sooner	XXXXXXXXX1327	\$1,000.00
9/14/06	O'Fallon, Illinois	O'Fallon	XXXXXXXXX1327	\$6,500.00
9/21/06	Saint Louis, Missouri	Plaza	XXXXXXXXX1327	\$5,000.00
			XXXXXXXXX1327	
			Total	\$66,300.00
8/19/04	Swansea, Illinois	Swansea	XXXXXXXXX2354	\$1,000.00
8/23/04	Chesterfield, Missouri	Baxter Road	XXXXXXXXX2354	\$5,000.00
9/3/04	Chesterfield, Missouri	Baxter Road	XXXXXXXXX2354	\$4,000.00
9/21/04	Ballwin, Missouri	Ballwin	XXXXXXXXX2354	\$7,000.00
9/21/04	Swansea, Illinois	Swansea	XXXXXXXXX2354	\$2,500.00
9/29/04	Chesterfield, Missouri	Baxter Road	XXXXXXXXX2354	\$7,000.00
			XXXXXXXXX2354	
			Total	\$26,500.00
8/9/04	Little Rock, Arkansas	Downtown North	XXXXXXXXX6566	\$5,000.00
8/13/04	Saint Louis, Missouri	East Roosevelt	XXXXXXXXX6566	\$400.00
8/23/04	Chesterfield, Missouri	Chesterfield	XXXXXXXXX6566	\$5,000.00
9/3/04	Chesterfield, Missouri	Chesterfield	XXXXXXXXX6566	\$3,600.00
9/22/04	Chesterfield, Missouri	Baxter Road	XXXXXXXXX6566	\$7,000.00
			XXXXXXXXX6566	
			Total	\$21,000.00

<i>Date of Dep</i>	<i>City, State of First Dep</i>	<i>Bank of America Branch</i>	<i>Account No.</i>	<i>Amount</i>
9/15/05	Chesterfield, Missouri	Baxter Road	XXXXXXXXX7296	\$3,400.00
9/30/05	O'Fallon, Illinois	O'Fallon	XXXXXXXXX7296	\$6,000.00
2/9/06	Arizona	Mariposa	XXXXXXXXX7296	\$5,000.00
2/14/06	Arizona	Mariposa	XXXXXXXXX7296	\$3,000.00
2/22/06	Arizona	Mariposa	XXXXXXXXX7296	\$2,000.00
2/27/06	Arizona	Nogales	XXXXXXXXX7296	\$5,000.00
3/17/06	Arizona	Mariposa	XXXXXXXXX7296	\$4,000.00
4/10/06	Arizona	Hewlett	XXXXXXXXX7296	\$2,000.00
4/11/06	Arizona	Mariposa	XXXXXXXXX7296	\$3,000.00
5/1/06	Arizona	Mariposa	XXXXXXXXX7296	\$3,000.00
6/19/06	Arizona	Mariposa	XXXXXXXXX7296	\$5,000.00
7/24/06	Arizona	Mariposa	XXXXXXXXX7296	\$1,000.00
			XXXXXXXXX7296 Total	\$42,400.00
3/11/06	Chesterfield, Missouri	Baxter Road	XXXXXXXXX8770	\$8,000.00
3/29/06	Chesterfield, Missouri	Baxter Road	XXXXXXXXX8770	\$8,000.00
4/7/06	Chesterfield, Missouri	Baxter Road	XXXXXXXXX8770	\$2,600.00
4/18/06	Saint Louis, Missouri	Plaza	XXXXXXXXX8770	\$7,970.00
5/1/06	Chesterfield, Missouri	Baxter Road	XXXXXXXXX8770	\$8,000.00
5/15/06	Swansea, Illinois	Swansea	XXXXXXXXX8770	\$7,500.00
5/25/06	Chesterfield, Missouri	Baxter Road	XXXXXXXXX8770	\$7,000.00
			XXXXXXXXX8770 Total	\$49,070.00
			Grand Total	\$261,800.00

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 1956(h).

COUNT THREE

1. The allegations of Count One of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.

2. The property, real and personal of defendants Erik G. Garcia, and Marco A. Garcia,

(a) constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of the violation of law set out in Count One of this Indictment, and

(b) used, or intended to be used, in any manner or part to commit or to facilitate the commission of such violations is subject to forfeiture to the United States.

3. Subject to forfeiture is approximately \$445,657 in United States currency in that such sum in the aggregate is property constituting, or derived from any proceeds the defendants obtained directly or indirectly as a result of the offense alleged in Count One.

4. Properties specifically subject to forfeiture as set out at paragraph 2 and 3 above, include but are not limited to:

(a) \$60,000 in United States currency seized from co-conspirator Zelman Sanders, III, on June 6, 2006;

(b) \$22,657 in United States currency seized from co-conspirator Zelman Sanders, III, on January 19, 2007;

5. If any of the property described in paragraphs 2, 3 and 4 above, as being subject to forfeiture pursuant to Title 21, United States Code, Section 853(a), as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the defendants up to the value of the property described in paragraphs 2, 3 and 4, above, or elsewhere, as being subject to forfeiture.

COUNT FOUR

1. The allegations of Count Two of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to the provisions of Title 18, United States Code, Section 982.

2. The property, real and personal of defendants Erik G. Garcia, and Marco A. Garcia, is property subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 982(a)(1).

3. Subject to forfeiture is \$445,657 in United States currency which was property involved in the offense alleged in Count Two or property traceable to such property.

4. If any of the property described in paragraphs 2 and 3 above, as being subject to forfeiture pursuant to Title 18, United States Code, Section 982(a), as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1)(A) and Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the defendants up to the value of the property described in paragraphs 2 and 3, above, or elsewhere, as being subject to forfeiture.

A TRUE BILL.

FOREPERSON

CATHERINE L. HANAWAY
United States Attorney

NOELLE C. COLLINS, #109678
Assistant United States Attorney